



## UEC Follow Up

**William Honker** to: Wren Stenger, Stacey Dwyer, Dellinger.Philip  
Cc: Tomika McGee

10/09/2012 05:48 PM

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I sat in on Sam's call with Bob S today, and here are the follow up actions for us:

- Sam asked for bullets to send to Bob P - I sent him the message below.
- Discuss monitoring well scenario with Groundwater District - would they be willing to maintain and sample longer term monitoring wells if UEC funded up front?
- Discuss monitoring well option further with TCEQ. I discussed briefly with Charles Maguire this morning, but we should have a follow up discussion.

I could get on the phone with you all tomorrow if necessary to discuss further.

Bill

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From: William Honker/R6/USEPA/US  
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Cc: Wren Stenger/R6/USEPA/US@EPA  
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Sam - potential bullets for HQ:

- Discussions with TCEQ and UEC over the last several months have led to a revised aquifer exemption proposal with reduced boundaries. The boundary for the "A" sand (uppermost aquifer) is greatly reduced, and the boundary for the "B", "C", and "D" sands is somewhat reduced. UEC submitted an October 3 request to TCEQ to formally modify the proposal for exemption. TCEQ has not yet submitted a revised request to Region 6.
- Region 6 has reviewed an extensive amount of additional data

provided by UEC regarding the direction of groundwater flow within the area proposed for exemption, the potential for fluid migration from the B sand to the A sand, and the potential for contaminant migration towards several wells southeast of the proposed mining area.

- After thoroughly reviewing the additional data, Region 6 believes there is still uncertainty on the overall groundwater flow direction and potential connection between the A and B sands in the area southeast of the proposed exemption. Of special concern are two wells owned by a local church about 1/4 mile southeast of the proposed exemption.
- UEC has declined to do additional testing in this area, and the church has declined a UEC offer to drill a new well for the church's use.
- In order to provide some verification that contamination is not migrating toward the water wells, EPA is discussing with TCEQ and UEC an option of installing one or more monitoring wells between the exempted area and the church wells. These wells would be in addition to monitoring required in TCEQ's permit, and the monitoring period would extend some period of time after mining and restoration are completed. While UEC initially appears unwilling to conduct such extended monitoring, they may be willing to provide funding for a third party (such as the Goliad County Groundwater Conservation District) to conduct this monitoring.
- If an agreement can be reached on this issue, it could be reflected in a revised request from TCEQ to Region 6.

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